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Attorneys for Defendant  
**RAEJOHNE FOSTER**

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

ANGELA CUMMINGS,

**Plaintiff,**

VS.

VALLEY HEALTH SYSTEM, LLC, a  
Delaware Limited-Liability Company d/b/a  
DESERT SPRINGS HOSPITAL;  
RAEJOHNE FOSTER, an individual,

## Defendants.

Case No. 2:13-CV-00479-APG-GWF

**STIPULATION AND PROPOSED ORDER  
TO EXTEND THE DEADLINE TO FILE  
DISMISSAL PAPERS**

## **(Second Request)**

Defendant RaeJohne Foster (“Foster”) and Plaintiff Angela Cummings (“Cummings”), by and through their respective counsel of record, hereby stipulate and agree to extend the deadline to submit dismissal papers by from the current deadline of April 5, 2019 to **May 6, 2019**.

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Counsel for both parties recently resolved a final issue related to the terms of the agreement and are awaiting the return of the executed settlement agreement from Plaintiff. A thirty-one day extension is requested to allow sufficient time to finalize the settlement process and file a stipulation of dismissal. This is the second request.

Dated: April 4, 2019

Respectfully submitted,

Respectfully submitted,

/s/ James P. Kemp, Esq.

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KEMP & KEMP, ATTORNEYS AT LAW

Attorneys for Plaintiff

/s/ Marcus B. Smith, Esq.

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Attorneys for Defendant

## IT IS SO ORDERD.

Dated this 5th day of April, 2019.



**UNITED STATES DISTRICT JUDGE**

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